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6 Attorneys for Defendant Michael Kara

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
11

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 MICHAEL KARA,

16 Defendant
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Case No.: CR-09-00417 EMC

**STIPULATION AND [PROPOSED]
ORDER MODIFYING BAIL
CONDITIONS**

1 The parties hereby stipulate and move this Court to enter an order allowing
2 defendant Michael Kara to travel to the Eastern District of California for business
3 purposes with prior notice to, and approval from, his supervising Pre-trial Services
4 Officer.

5 Mr. Kara is charged with insider trading. He has pled guilty pursuant to a plea
6 agreement and is awaiting sentencing. His release conditions currently limit his travel to
7 the Northern District of California except for travel to Vallejo, California, to visit his
8 mother. Docket No. 3 (April 30, 2009).

9 Mr. Kara heads an environmental remediation company. His company is currently
10 pursuing work in the Sacramento area. Acquiring the work and maintaining it will
11 require him to travel to the Eastern District of California.

12 Mr. Kara in his more than a two and a half years on supervision has had no
13 violations.

14 Dated:

Respectfully Submitted,

15 RAMSEY & EHRLICH LLP

16 //s//

17 ISMAIL RAMSEY
18 ATTORNEY FOR MICHAEL KARA

19 MELINDA L. HAAG
20 US ATTORNEY

21 //s//

22 ADAM REEVES
23 ASSISTANT US ATTORNEY

24 GOOD CAUSE HAVING BEEN SHOWN, IT IS SO ORDERED.

25 Dated: 4/17/12

26 
27 HON. LAUREL BEELER HANDOR VAO45
28 US MAGISTRATE JUDGE